

**IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION**

BRENDA K. HURSTON

Plaintiff

CASE NO. C-1-01-313

Judge Timothy S. Black, M.J.

-vs-

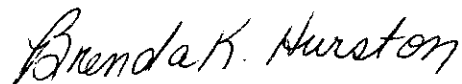
BUTLER COUNTY DEPT. OF  
JOB AND FAMILY SERVICES

Defendants

**MOTION AND MEMORANDUM  
OF PLAINTIFF BRENDA  
HURSTON FOR AN ORDER  
COMPELLING DEFENDANT'S  
PRODUCTION OF DOCUMENTS  
AND INVENTORY DISCOVERY**

Now comes Brenda K. Hurston, Plaintiff and hereby moves the Court to compel Butler County Department of Job and Family Services, Defendant pursuant to Federal Rule of Civil Procedure 26(c) or Rule 37(a) for Production of documents and the inventory of plaintiff's discovery. This motion is supported by the attached memorandum.

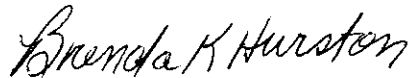
BRENDA K. HURSTON, PLAINTIFF



Brenda K. Hurston, Plaintiff  
1812 Grand Avenue  
Middletown, OH 45044  
(513) 420-9692

**CERTIFICATE OF SERVICE**

I Brenda K. Hurston, hereby certify that a true and correct copy of Plaintiff's motion for and order compelling production of documents and inventory discovery has been FAXS and by regular meter mail to Jack C. McGowan, attorney for defendant, Butler County Department of Job and Family Services, 246 High Street, Hamilton, Ohio 45011 the 1<sup>st</sup> day of October, 2004.



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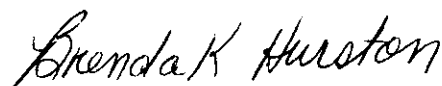
Brenda K. Hurston, Plaintiff

**PLAINTIFF'S MEMORANDUM IN SUPPORT OF AN ORDER TO COMPEL  
PRODUCTION OF DOCUMENTS AND DISCOVERY**

In support of Plaintiff's motion for an order pursuant to Federal Rule 26(c) or 37(a) compelling the defendant for production of documents and discovery states that this request is necessary and reasonable so that the Plaintiff may comply with this Court's discovery order and further, to enable the Plaintiff to adequately represent herself, Pro Se.

Previous efforts to request production of documents and to schedule a time to inventory discovery(s) have been made and have been unsuccessful, attached hereto as Exhibit "3-D (1-23)".

BRENDA K. HURSTON

A handwritten signature in cursive script that reads "Brenda K. Hurston".

Brenda K. Hurston, Plaintiff, Pro Se  
1812 Grand Ave.  
Middletown, OH 45044  
(513) 420-9692

Brenda K. Hurston  
1812 Grand Avenue  
Middletown, OH 45044  
PH-513-420-9692



July 23, 2004

**VIA CERTIFIED MAIL**

Jack C. McGowan  
Attorneys at Law  
246 High Street  
Hamilton, OH 45011

Re: Brenda K. Hurston vs. Butler County Job & Family Services

Dear Mr. McGowan:

Enclosed please find copies of Plaintiff's Motion to File Leave to Amend Witness List and Amended Witness List that is being filed with the Court. Also, enclosed please find copy of examples 1-6 and Plaintiff, Brenda Hurston's Request for Production of Documents, Things, and Business Records. Please respond within 30 days of receipt hereof to the following requests pursuant to Rule 34, Federal Rules of Civil Procedure.

Thank you for your attention, regarding this matter.

Sincerely,

A handwritten signature in cursive script that reads "Brenda K. Hurston".

Brenda K. Hurston

IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION

BRENDA K. HURSTON : CASE NO. C-1-01-313  
Plaintiff : Judge Weber; Timothy S. Black, M.J.

-vs-

BUTLER COUNTY DEPT. OF  
JOB AND FAMILY SERVICES :

Defendants

**PLAINTIFF, BRENDA HURSTON'S  
REQUEST FOR PRODUCTION OF  
DOCUMENTS, THINGS, AND  
BUSINESS RECORDS**

\_\_\_\_\_  
Plaintiff, Brenda K. Hurston requests defendant, Butler County Department of Job and Family Services, to respond within 30 days of receipt hereof to the following requests pursuant to Rule 34, Federal Rules of Civil Procedure:

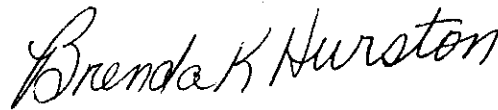
That defendant produces copy of each of the following documents:

1. **Dr. Randolph's May 5, 1998 report.**
2. **Personnel Action Forms from 6-6-88 to 12-30-01.** See example #1, dated 3-15-93.
3. **Personnel File Checklist from 6-6-88 to 12-30-01.** See example #2, dated 8-3-88.
4. **Personnel Documents that reflects the plaintiff paycheck from 6-6-88 to 12-30-01.** See example #3, dated 6-9-00.
5. **Personnel Interview Checklist from 2-88 to 12-88.** See example # 4, dated 6-2-88.
6. **Plaintiff's request to personnel for an interview for the Machine Operator 2 job position.** See example #5, dated 4-6-88.

7. **Personnel/Betty Proctor's notification to plaintiff indicating that she received the Machine Operator 2 job position. See example # 6, dated 6-3-88.**

Thank you for your attention, regarding this matter.

Sincerely yours,

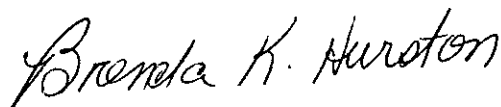


Brenda K. Hurston, Plaintiff, Pro Se  
1812 Grand Avenue  
Middletown, OH 45044  
1-513-420-9692

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of PLAINTIFF, BRENDA HURSTON'S REQUEST FOR PRODUCTION OF DOCUMENTS, THINGS, AND BUSINESS RECORDS has been sent by certified mail to Jack C. McGowan, Attorney for Defendants, Butler County Department of Job and Family Services, 246 High Street, Hamilton, OH 45011 by the 23<sup>rd</sup>, day of July, 2004.

Respectfully submitted,



Brenda K. Hurston, Plaintiff, Pro Se  
1812 Grand Avenue  
Middletown, OH 45044  
(513) 420-9602

Example # 1.

## PERSONNEL ACTION

County Dept. of Human Resources

No.

STATE OF OHIO

3306391

NAME FROM Hurston, Brenda K.				SEX F	DATE OF BIRTH 8 5 59				NO. OF YEARS 12	EMPLOYEE MA 110	
TO											
ADDRESS											

FROM				TO				DATE				TIME			
------	--	--	--	----	--	--	--	------	--	--	--	------	--	--	--

EFFECTIVE DATE			PAYROLL NUMBER		POSITION NUMBER		BAND UNIT		FLAG		SOCIAL SECURITY NUMBER			
MO 3	DAY 15	YR 93	FROM		11001.0						268-66-3403			
TO														

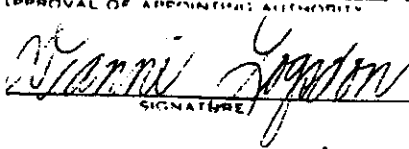
FROM				CLASS TITLE		RANK		STEP		RATE		CLASS		FUND		SAC		ADIC	
				Off Mach Opr 2		12422		04		5		8.83		C					
TO																			

APPOINTMENT		CHANGE		SEPARATION		INTERRUPTION	
<input type="checkbox"/> 0 EMERGENCY ENDS _____ <input type="checkbox"/> 1 FULL TIME PERMANENT <input type="checkbox"/> 2 FULL TIME TEMPORARY ENDS _____ <input type="checkbox"/> 3 FULL TIME SEASONAL ENDS _____ <input type="checkbox"/> 4 PART TIME PERMANENT <input type="checkbox"/> 5 PART TIME TEMPORARY ENDS _____ <input type="checkbox"/> 6 PART TIME SEASONAL ENDS _____ <input type="checkbox"/> 7 INTERMITTENT <input type="checkbox"/> 8 FIXED TERM-SALARIED ENDS _____ <input type="checkbox"/> 9 FIXED TERM-PER DIEM <input type="checkbox"/> 10 APPOINTMENT DATE CORRECTED <input type="checkbox"/> 11 FULL TIME INTERIM INTERNAL <input type="checkbox"/> 12 FULL TIME INTERIM EXTERNAL <input type="checkbox"/> 13 PART TIME INTERIM INTERNAL <input type="checkbox"/> 14 PART TIME INTERIM EXTERNAL <input type="checkbox"/> 15 UNIT 10 INTERIM <input type="checkbox"/> 16 UNIT 11, 12 INTERIM <input type="checkbox"/> 17 ESTABLISHED TERM REGULAR <input type="checkbox"/> 18 ESTABLISHED TERM IRREGULAR		<input type="checkbox"/> 1 PROMOTION <input type="checkbox"/> 2 DEMOTION <input type="checkbox"/> 3 LATERAL CLASS <input type="checkbox"/> 4 TRANSFER WITHIN AGENCY <input type="checkbox"/> 5 TRANSFER BETWEEN AGENCIES <input type="checkbox"/> 6 CIVIL SERVICE STATUS <input type="checkbox"/> 7 NAME <input type="checkbox"/> 8 APPOINTMENT CHANGE TO _____ <input type="checkbox"/> 9 DISPLACEMENT <input type="checkbox"/> 10 RATE <input type="checkbox"/> 11 REASSIGNMENT <input type="checkbox"/> 12 POSITION CHANGED <input type="checkbox"/> 13 TEMPORARY WORK LEVEL ENDS _____ CLASS _____ RATE _____ <input type="checkbox"/> 14 REASSIGNED BY APPEAL DECISION <input type="checkbox"/> 15 CANCEL INTERIM <input type="checkbox"/> 16 SERVICE CHANGE <input type="checkbox"/> 17 CORRECTION OF TO _____		<input type="checkbox"/> 1 RESIGNED REASON _____ <input type="checkbox"/> 2 RETIRED <input type="checkbox"/> 3 DISABILITY RETIREMENT <input type="checkbox"/> 4 DECEASED <input type="checkbox"/> 5 REMOVED <input type="checkbox"/> 6 PROBATIONARY <input type="checkbox"/> 7 LAID OFF <input type="checkbox"/> 8 UNCLASSIFIED <input type="checkbox"/> 9 OTHER (SEE REMARKS) <input type="checkbox"/> 10 CANCEL APPOINTMENT <input type="checkbox"/> 12 DISABILITY SEPARATION <input type="checkbox"/> 13 INTERIM SEPARATION		<input type="checkbox"/> 1 MILITARY LEAVE <input type="checkbox"/> 2 PERSONAL LEAVE ENDS _____ <input type="checkbox"/> 3 SUSPENSION ENDS _____ <input type="checkbox"/> 4 DISABILITY LEAVE <input type="checkbox"/> 5 SEASONAL END _____ <input type="checkbox"/> 7 EDUCATIONAL LEAVE ENDS _____ <input type="checkbox"/> 9 WORKERS COMP BENEFITS <input type="checkbox"/> 11 UNION LEAVE <input type="checkbox"/> 12 END A17 _____ <input type="checkbox"/> 13 END A18 _____	
						REINSTATEMENT <input type="checkbox"/> 1 FROM SEPARATION <input checked="" type="checkbox"/> 2 FROM INTERRUPTION <input type="checkbox"/> 3 BY PERSONNEL BD. OF REVIEW <input type="checkbox"/> 4 BY COURT ORDER <input type="checkbox"/> 5 SEPARATION RESCINDED <input type="checkbox"/> 7 BY GRIEVANCE <input type="checkbox"/> 8 BY ARBITRATION AWARD	

PRIOR SERVICE	DATE OF LAST PROMOTION	CERTIFICATION NO.	DATE OF CONTINUOUS SERVICE	BUDGETED HOURS
			6/6/88	

REMARKS (INCLUDE ANY PAY SUPPLEMENTS TO BE PAID)

Return from medical leave.

APPROVAL OF APPOINTING AUTHORITY		PERSONNEL DIVISION	
 SIGNATURE		3/15/93 DATE	
		CERTIFICATION <input type="checkbox"/> APPROVED <input type="checkbox"/> DISAPPROVED <input type="checkbox"/> NOTED	

Example #2

PERSONNEL FILE CHECKLIST

1. ☒ Personnel Actions (stapled to inside front cover)
2. ☒ Position Description
3. ☒ Acknowledgement Receipt of Position Description
4. ☒ Application
5. ☒ School Credits and Certificates
6. ☐ Written Reprimands
7. ☐ Accident Reports; Workmen's Comp.
8. ☐ Garnishments
9. ☒ Miscellaneous: letters regarding promotions or non-acceptance; change of address; W-2s; blank Personnel Action form with current PD #
10. ☐ Overtime Requests (stapled by year)
11. ☐ Sick Leave and Vacation Sheets (stapled by year)
12. ☒ Evaluations (stapled to inside back cover)

## CAMERA CARD

**EMPLOYEE**Identification Card  
Butler County Human Services  
Signature BRENDA K KING

8-3-83





BUTLER COUNTY DEPARTMENT OF HUMAN SERVICES

Example # 3.

6-9-00  
Pay Day Date

TO: Brenda Hurston

FROM: Personnel

Your paycheck reflects the following:

         Step increase

✓ Longevity

         Overtime

         Raise

         Promotion

         Other                                 

-----  
Leave Without Pay For

         Not enough or no sick time

         Not enough or no vacation time

         Late time

         Other                                 

-----  
Your current hourly rate of pay is 11.43

PERSONNEL INTERVIEW CHECKLIST

Example #4

- ☐ Pay Scale of Position
- ☐ Pay Periods
- ☐ Pay Dates
- ☐ Probation Periods
- ☐ Position Description
- ☐ Work Hours
- ☐ Vacation/Sick Time/Leave Without Pay
- ☐ Prior Service
- ☐ Accumulated, Unused Sick Leave
- ☐ Longevity Pay
- ☐ Vacation Credit

- ☐ Travelers Insurance *none*
- ☐ Benefit Plan
- ☐ Reporting of Changes

- ☐ Credit Union
- ☐ Residency
- ☐ ID
- ☐ Handbook
- ☐ Confidentiality

I acknowledge that the above policies and benefits have been explained to my satisfaction during an interview on 6/2/88.

Brenda K King  
Employee's Signature

6-3-88  
Date

Betty Proctor  
Personnel Officer's Signature

Example # 5

**Butler County Department of Human Services**DEPARTMENTAL CORRESPONDENCE

BCDHS-211

DATE 4/6/88

SUBJECT \_\_\_\_\_

TO Personnel/Betty Proctor FROM Brenda King

Your announcement of a opening for the position of "12332-Data Entry Operator 2" was posted on the board at the Middletown's Butler Co. Dept. of Human Services. Data Entry is an area of interest to me, and I would like to apply for the position.

May I come for an interview at a time that is convenient for you?

Example # 6

**Butler County Department of Human Services**DEPARTMENTAL CORRESPONDENCE

BCDHS-211

DATE 6/3/88

SUBJECT \_\_\_\_\_

TO Brenda King FROM Personnel/Betty Proctor

This is an intermittent Data Entry Opr 2 position. In an intermittent appointment the only benefit that you are eligible for is sick time which is based on the number of hours that you work each week. (You are not eligible for any vacation and/or holidays with pay, or any health insurance coverage) You will have an irregular work schedule and you cannot work more than 1,000 hrs. per year. Your supervisor is Charlene McIntyre and you will be on probation for 180 days. your rate of pay is \$6.65 per hour and you will receive your first paycheck on 6/24/88, for the week of 6/6 & 6/13/88.

Brenda K. Hurston  
1812 Grand Avenue  
Middletown, OH 45044  
PH-513-420-9692

July 30, 2004

**VIA CERTIFIED MAIL**

Jack C. McGowan  
Attorneys at Law  
246 High Street  
Hamilton, OH 45011

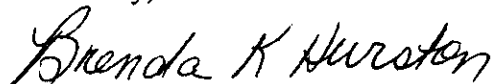
RE: Brenda K. Hurston vs. Butler County Job & Family Services

Dear Mr. McGowan:

Enclosed please find copy of, Plaintiff, Brenda Hurston's Request for Production of Documents, Things, and Business Records. Please respond within 30 days of receipt hereof to the following requests pursuant to Rule 34, Federal Rules of Civil Procedure.

Thank you for your attention, regarding this matter.

Sincerely,

A handwritten signature in black ink that reads "Brenda K Hurston". The signature is written in a cursive, flowing style.

Brenda K. Hurston, Plaintiff, Pro Se

IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION

BRENDA K. HURSTON

:

CASE NO. C-1-01-313

Plaintiff

:

Judge Weber; Timothy S. Black, M.J.

-vs-

BUTLER COUNTY DEPT. OF  
JOB AND FAMILY SERVICES

:

**PLAINTIFF, BRENDA HURSTON'S  
REQUEST FOR PRODUCTION OF  
DOCUMENTS, THINGS, AND  
BUSINESS RECORDS**

Defendants

\_\_\_\_\_:

On July, 30<sup>th</sup>, 2004, Plaintiff, Brenda K. Hurston requests defendant, Butler County Department of Job and Family Services, to respond within 30 days of receipt hereof to the following requests pursuant to Rule 34, Federal Rules of Civil Procedure:

That defendant produces copy of each of the following documents:

1. Union's Contract Agreements between Butler County Department of Human Services and American Federation of State, County, and Municipal Employees, Ohio Council 8, Local 3062, AFL-CIO, from November 30, 1987 through 2001.
2. Copy of Dianne Logsdon's Guest Ledger/ Visitor's Registration Log from 6-19-90 to 7-10-90.

Thank you for your attention, regarding this matter.

Sincerely yours,

*Brenda K Hurston*

\_\_\_\_\_  
Brenda K. Hurston, Plaintiff, Pro Se

1812 Grand Avenue  
Middletown, OH 45044  
1-513-420-9692

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of PLAINTIFF, BRENDA HURSTON'S REQUEST FOR PRODUCTION OF DOCUMENTS, THINGS, AND BUSINESS RECORDS has been sent by certified mail to Jack C. McGowan, Attorney for Defendants, Butler County Department of Job and Family Services, 246 High Street, Hamilton, OH 45011 by the 30<sup>th</sup>, day of July, 2004.

Respectfully submitted,

A handwritten signature in cursive script that reads "Brenda K Hurston".

---

Brenda K. Hurston, Plaintiff, Pro Se  
1812 Grand Avenue  
Middletown, OH 45044  
(513) 420-9602

Brenda K. Hurston  
1812 Grand Avenue  
Middletown, OH 45044  
PH-513-420-9692

September 4, 2004

**VIA CERTIFIED MAIL**

Jack C. McGowan  
Attorneys at Law  
246 High Street  
Hamilton, OH 45011

RE: Brenda K. Hurston vs. Butler County Job & Family Services

Dear Mr. McGowan:

Enclosed please find copy of, Plaintiff, Brenda Hurston's (two) Second Requests for Production of Documents, Things, and Business Records. It is my hope to receive this information requested within 10 days without Court intervention.

Thank you, in advance, for your attention, regarding this matter.

Sincerely,

A handwritten signature in cursive script that reads "Brenda K Hurston".

Brenda K. Hurston, Plaintiff, Pro Se

**IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION**

BRENDA K. HURSTON

:

CASE NO. C-1-01-313

Plaintiff

:

Judge Weber; Timothy S. Black, M.J.

-vs-

BUTLER COUNTY DEPT. OF  
JOB AND FAMILY SERVICES

:

Defendants

**PLAINTIFF, BRENDA HURSTON'S  
SECOND REQUEST FOR PRODUCTION  
OF DOCUMENTS, THINGS,  
AND BUSINESS RECORDS**

\_\_\_\_\_:

On July 30<sup>th</sup>, 2004, Plaintiff, Brenda K. Hurston requests defendant, Butler County Department of Job and Family Services, to respond within 30 days of receipt hereof to the following requests pursuant to Rule 34, Federal Rules of Civil Procedure:

That defendant produces copy of each of the following documents:

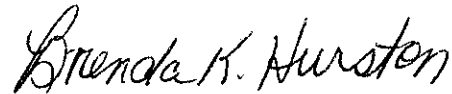
1. Union's Contract Agreements between Butler County Department of Human Services and American Federation of State, County, and Municipal Employees, Ohio Council 8, Local 3062, AFL-CIO, from November 30, 1987 through 2001.
2. Copy of Dianne Logsdon's Guest Ledger/ Visitor's Registration Log from 6-19-90 to 7-10-90.

As of Saturday, September 4, 2004, the defendant failed to respond within 30 days of first request. It is my hope to receive this information requested within 10 days without Court intervention.



Thank you, in advance for your attention, regarding this matter.

Sincerely yours,



---

Brenda K. Hurston, Plaintiff, Pro Se  
1812 Grand Avenue  
Middletown, OH 45044  
1-513-420-9692

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of PLAINTIFF, BRENDA HURSTON'S SECOND REQUEST FOR PRODUCTION OF DOCUMENTS, THINGS, AND BUSINESS RECORDS has been sent by certified mail to Jack C. McGowan, Attorney for Defendants, Butler County Department of Job and Family Services, 246 High Street, Hamilton, OH 45011 on the 4<sup>th</sup>, day of September, 2004.

Respectfully submitted,



---

Brenda K. Hurston, Plaintiff, Pro Se  
1812 Grand Avenue  
Middletown, OH 45044  
(513) 420-9602

**IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION**

BRENDA K. HURSTON

:

**CASE NO. C-1-01-313**

Plaintiff

:

Judge Weber; Timothy S. Black, M.J.

-VS-

BUTLER COUNTY DEPT. OF  
JOB AND FAMILY SERVICES

:

**PLAINTIFF, BRENDA HURSTON'S  
SECOND REQUEST FOR PRODUCTION  
OF DOCUMENTS, THINGS,  
AND BUSINESS RECORDS**

Defendants

\_\_\_\_\_ :

Plaintiff, Brenda K. Hurston respectfully requests for the second time the defendant, Butler County Department of Job and Family Services, to respond to the following requests. It is my hope to receive this information requested within 10 days without Court intervention. The first request was made on or approximately July 23, 2004. The defendant failed to respond within 30 days pursuant to Rule 34, Federal Rules of Civil Procedure after receipt of first request on July 25, 2004.

The second request is that the defendant produces copy of each of the following documents:

1. **Dr. Randolph's May 5, 1998 report.**
2. **Personnel Action Forms from 6-6-88 to 12-30-01.** See example #1, dated 3-15-93.
3. **Personnel File Checklist from 6-6-88 to 12-30-01.** See example #2, dated 8-3-88.

4. **Personnel Documents that reflects the plaintiff paycheck from 6-6-88 to 12-30-01. See example #3, dated 6-9-00.**

Thank you, in advance, for your cooperation, with this matter.

Sincerely yours,

*Brenda K. Hurston*

---

Brenda K. Hurston, Plaintiff, Pro Se

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of PLAINTIFF, BRENDA HURSTON'S SECOND REQUEST FOR PRODUCTION OF DOCUMENTS, THINGS, AND BUSINESS RECORDS has been sent by certified mail to Jack C. McGowan, Attorney for Defendants, Butler County Department of Job and Family Services, 246 High Street, Hamilton, OH 45011 by the 4<sup>th</sup>, day of September, 2004.

Respectfully submitted,

*Brenda K. Hurston*

---

Brenda K. Hurston, Plaintiff  
1812 Grand Avenue  
Middletown, OH 45044  
(513) 420-9692

AUG 2 2004

IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION

BRENDA K. HURSTON

:

CASE NO. C-1-01-313

Plaintiff

:

Judge Weber; Timothy S. Black, M.J.

-vs-

RESPONSES TO  
**PLAINTIFF, BRENDA HURSTON'S**  
**REQUEST FOR PRODUCTION OF**  
**DOCUMENTS, THINGS, AND**  
**BUSINESS RECORDS**

BUTLER COUNTY DEPT. OF  
JOB AND FAMILY SERVICES

:

Defendants

\_\_\_\_\_:

On July, 30<sup>th</sup>, 2004, Plaintiff, Brenda K. Hurston requests defendant, Butler County Department of Job and Family Services, to respond within 30 days of receipt hereof to the following requests pursuant to Rule 34, Federal Rules of Civil Procedure:

That defendant produces copy of each of the following documents:

1. Union's Contract Agreements between Butler County Department of Human Services and American Federation of State, County, and Municipal Employees, Ohio Council 8, Local 3062, AFL-CIO, from November 30, 1987 through 2001.  
Please see attached.
2. Copy of Dianne Logsdon's Guest Ledger/ Visitor's Registration Log from 6-19-90 to 7-10-90.  
Defendant has searched and has been unable to find this document.  
It is believed the document was not retained and for that reason  
Thank you for your attention, regarding this matter. cannot be produced.

Sincerely yours,

*Brenda K. Hurston*

\_\_\_\_\_  
Brenda K. Hurston, Plaintiff, Pro Se

1812 Grand Avenue  
Middletown, OH 45044  
1-513-420-9692

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of PLAINTIFF, BRENDA HURSTON'S REQUEST FOR PRODUCTION OF DOCUMENTS, THINGS, AND BUSINESS RECORDS has been sent by certified mail to Jack C. McGowan, Attorney for Defendants, Butler County Department of Job and Family Services, 246 High Street, Hamilton, OH 45011 by the 30<sup>th</sup>, day of July, 2004.

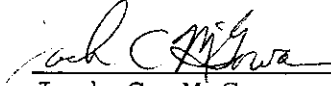
Respectfully submitted,

*Brenda K Hurston*

---

Brenda K. Hurston, Plaintiff, Pro Se  
1812 Grand Avenue  
Middletown, OH 45044  
(513) 420-9602

McGOWAN & JACOBS, LLC



Jack C. McGowan (0005619)

Attorney for Defendants

Butler County Department of Job  
and Family Services

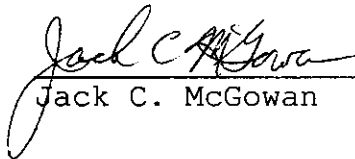
246 High Street

Hamilton, Ohio 45011

(513) 844-2000

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the within has been hand delivered  
to Brenda K. Hurston, 1812 Grand Avenue, Middletown, Ohio 45044 this  
10<sup>th</sup> day of September, 2004



Jack C. McGowan

Brenda K. Hurston  
1812 Grand Ave.  
Middletown, OH 45044

**FAX**

Date: October 1, 2004

Number of pages including cover sheet: 7

To: **Jack C. McGowan & Associates**  
Attorneys and Counselors at Law  
246 High Street  
Hamilton, OH 45011  
Phone: (513) 844-2000  
Fax phone: (513) 868-1190

From: **Brenda Hurston**

1812 Grand Ave.  
Middletown, OH 45044  
Phone: (513) 420-9692  
Fax phone: (513) 420-9692

REMARKS: Urgent\_\_\_ For your review\_\_\_ Reply ASAP ☒ Please comment\_\_\_

Will you please send me a correct and true copy of the Union's Contract Agreements between Butler County Department of Human Services and American Federation of State, County, and Municipal Employees, Ohio Council 8 Local 3062, AFL-CIO, 1987 through 2001? 1987 contract I did not received. 1990 contract had the odd pages missing from the contract. Some of the Classified Series are also missing.

Will you please send me a true and correct copy of Dr. Randolph's May 5, 1998 report.

Will you please send me the true and correct copies of Personnel Action forms from 6-6-88 to 12-20-01, Personnel File Checklist from 6-6-88 to 12-20-01, Personnel Documents that reflects the plaintiff's paycheck from 6-6-88 to 12-20-01, Personnel Interview Checklist from 2-88 to 12-88, and Plaintiff's request to personnel for an interview for the Machine Operator 2 job position. Please see the examples that I submitted to you on July 23 and 30, 2004.

**REMARKS CONTINUED:**

Attached October 1, 2004 letter, and Motion to compel defendant's production of documents and inventory of plaintiff discovery.

Thank you for your attention regarding this matter.



Brenda K. Hurston  
1812 Grand Avenue  
Middletown, OH 45044  
PH-513-420-9692

October 1, 2004

**LETTER BY FAX:**

Jack C. McGowan  
Attorneys at Law  
246 High Street  
Hamilton, OH 45011

Re: Brenda K. Hurston vs. Butler County Job & Family Services

Dear Mr. McGowan:

On Friday, September 15, 2004, I came to your office with my discovery and you told me that you were not able to inventory my discovery, due to having an appointment with a client and you did not have time. You told me to come back later and we could inventory my discovery. I told you that I would come back Monday, September 18, 2004. When I called to tell you that I was on my way, the secretary told me that You, Terri Niederman, and Mike Jacob were out of the office, I believe for the whole week. I then left you a voice mail asking you to contact me so that we can make arrangements. On Wednesday, September 20, 2004, Mike Jacob called and asked me to call him to make arrangement. On September 22, 2004, Mr. Jacob told me that he would not be available on Monday, September 25, 2004; and that you might be able to do the inventory of my discovery on Monday evening, September 25, 2004. I told Mr. Jacob to ask you to call me. I received no call from you or any representative of your office from September 22, 2004 to September 30, 2004.

Therefore, Thursday, September 30, 2004, 10:20 a.m., I called your office and the secretary that answered the telephone told me that You, Terri Niederman, and Mike Jacob are all out of the office again. You would not be back until Monday, October 4, 2004. I then left you a voice-mail message. Because of your non-corporation, Mr. Timothy S. Black's court order deadline is delayed by at least 15 days, which also put me in a bad light.

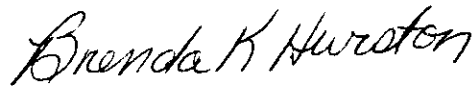
Enclosed is the letter to verify the message I left on your voice mail on September 30, 2004. The message is as follow:

I don't know what to do; I'm up against a discovery deadline, which was September 15, 2004. At that time, I understood that you had to see your client, and we had agreed to reschedule the meeting another day. I did tell you that I would be at your office the following Monday. You did not say that you would not be available on Monday, September 18, 2004. Since September 22, 2004, I have not been able to reach you or any member of your staff to submit my discovery.

Please respond at your earliest convenience. Your non-cooperation leaves me no other choice but to file motion to compel with the court. Also, I will let the Court know that you have not complied with my request for Production of Documents of July 23, and 30, 2004, pursuant to Rule 34, Federal Rules of Civil Procedure.

Thank you, in advance, for your attention, regarding this matter.

Sincerely,

A handwritten signature in cursive script that reads "Brenda K Hurston". The signature is written in dark ink and is positioned above the printed name.

Brenda K. Hurston